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November 20, 2020

MEMO ENDORSED

VIA ECF AND EMAIL

The Honorable Katherine Polk Failla
United States District Court, S.D.N.Y.
40 Foley Square
New York, NY 10007

Re: *Iowa Pub. Emps.' Ret. Sys., et al. v. Bank of Am. Corp., et al.*,
Case No. 17-cv-6221 (KPF) (S.D.N.Y.)

Dear Judge Failla:

EquiLend respectfully requests leave to file its brief in support of a motion for remedial order and related declarations and exhibits under seal.

EquiLend requests to file its brief under seal pursuant to the Court's request to counsel at the November 6 conference, in order to give the Court an opportunity to consider whether the brief should remain under seal. As we noted at that conference, we are not aware of any basis for this document to remain under seal. The Declaration of Christian J. Mahoney and the exhibit attached to that declaration have been filed under seal for the same reason and we are aware of no reason why these documents should remain under seal.

EquiLend requests that the Declaration of Garrett D. Shinn and the exhibits attached to that declaration remain under seal even if the Court chooses to place the brief on the public docket. The attached exhibits include materials that have been designated Confidential or Highly Confidential under the Protective Order in this case, including deposition transcripts and business documents that discuss business confidential matters.

Respectfully yours,
/s/ David I. Gelfand
David Gelfand

cc: All Counsel of Record (via email and ECF)

Application GRANTED. Defendant EquiLend's submissions in support of its motion for a remedial order shall be filed under seal, viewable only to the Court and parties.

Dated: November 20, 2020
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE